



August 2, 2010

Mr. Jared Blumenfeld, Regional Administrator
Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Regarding: Implementation of Greenhouse Gas Tailoring Rule for PSD and Title V

Dear Mr. Blumenfeld,

This letter is being submitted pursuant to the notification request in EPA's recently promulgated "Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule" (Tailoring Rule) at 75 FR 31514, Sections IV.C and V.C.5.

The Imperial County Air Pollution Control District (ICAPCD) currently does not implement a Prevention of Significant Deterioration program. The District does implement an approved Title V permitting program under Part 70.

ICAPCD is participating in coordinated efforts with the California Air Pollution Control Officers Association (CAPCOA) on PSD and the Tailoring Rule. CAPCOA is undertaking development of two model rules. One rule will implement all the program requirements of PSD, and the other will implement the requirements of the Tailoring Rule. Both efforts are being undertaken in collaboration with EPA Region IX staff.

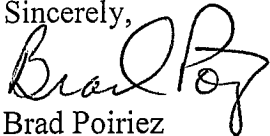
The PSD model rule effort is being led by Placer County Air Pollution Control District. At a minimum, it will incorporate the PSD program by reference, and it may include more specific local implementation language. Any questions on this model rule effort should be directed to Tom Christofk, the Air Pollution Control Officer in Placer County.

The second effort will produce a model general prohibitory rule that will (1) establish major source and major modification thresholds for GHGs consistent with PSD regulations and the Tailoring Rule for Districts with SIP approved PSD programs; (2) allow sources to limit their potential to emit GHGs consistent with the procedures and principles developed with EPA for Title V sources of other regulated air pollutants; and (3) establish monitoring, recordkeeping, reporting, enforcement, and other administrative requirements. Questions about the second model rule should be directed to Barbara Lee, the Air Pollution Control Officer in Northern Sonoma.

Because of the shortness of the implementation time frames for the Tailoring Rule, CAPCOA does not yet have model language for ICAPCD to evaluate, however we expect to have language in the next 60 days. ICAPCD will inform EPA Region IX of our intent to adopt either of these model rules by October 1, 2010, or whether we will pursue a different implementation path.

If you have any questions regarding the individual model rules, please address them to the contacts identified for the rules. You are welcome to contact me with any other questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Poiriez". The signature is stylized with a large, looped "P" and a trailing flourish.

Brad Poiriez
Air Pollution Control Officer